

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

LANCIUM LLC,

Plaintiff,

vs.

**U.S. DATA MINING GROUP, INC.
(D/B/A US BITCOIN),
U.S. MINING INFRASTRUCTURE
OPERATIONS, LLC, and
U.S. DATA KING MOUNTAIN LLC,**

Defendants.

Civil Action No. 6-23-CV-00344

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT**

Defendants move the Court to grant a 30-day extension, to July 3, 2023, of the deadline for Defendants to respond to Plaintiff Lancium LLC’s Complaint for Patent Infringement (ECF No. 1). Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, good cause exists for granting this Motion for the following reasons:

1. Plaintiff filed its Complaint for Patent Infringement on May 10, 2023, and Defendants’ current deadline to respond to the Complaint is June 1, 2023;
2. Defendants recently asked undersigned counsel to request an extension of time so Defendants can formally retain counsel and prepare initial responses to Plaintiff’s Complaint;
3. Plaintiff has confirmed that it does not oppose the extension sought in this Motion;
4. Defendants have requested this extension prior to the expiration of the original deadline to respond to the Complaint;

5. Defendants have not previously filed a motion to extend the time to answer or otherwise filed responsive pleadings;

6. Defendants have moved in good faith and not for the purpose of undue delay; and

7. If the Court grants this Motion, no other deadlines will be impacted.

Defendants respectfully request that the Court enter an order extending the time in which Defendants may respond to Plaintiff's Complaint by 30 days, up-to and including July 3, 2023.

DATED: May 30, 2023

Respectfully submitted,

/s/ Krishnan Padmanabhan

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**ATTORNEYS FOR DEFENDANTS
U.S. DATA MINING GROUP, INC.,
U.S. MINING INFRASTRUCTURE
OPERATIONS, LLC, AND
U.S. DATA KING MOUNTAIN LLC**

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for the parties have complied with the meet-and-confer requirement in Local Rule CV-7(G) and that Plaintiff has confirmed that it is unopposed to the relief sought in this Motion.

/s/ Krishnan Padmanabhan
Krishnan Padmanabhan

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5. Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Administrative Policies and Procedures for Electronic Filing in Civil and Criminal Cases, Western District of Texas, Section 14.

/s/ Krishnan Padmanabhan
Krishnan Padmanabhan